

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

Chapter 11

Square Two Financial Services Corporation,  
et al.<sup>1</sup>

Case No. 17-10659-jlg  
(Jointly Administered)

Debtors.

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**STIPULATION AND ORDER GRANTING STAY RELIEF**

**TO: THE HONORABLE JAMES L. GARRITY, JR.,  
UNITED STATES BANKRUPTCY JUDGE**

CACH, LLC (the “Debtor”) and Reverse Mortgage Solutions, Inc., as servicing agent for Bank of America, N.A. (the “Creditor,” together with the Debtor, the “Parties”), by and through their respective counsel, hereby enter into this Stipulated Order (the “Stipulated Order”), pursuant to 11 U.S.C. § 362(d) and represent as follows:

**WHEREAS**, on March 19, 2017, CACH, LLC, along with its affiliated Debtors filed a petition for relief, respectively, under Chapter 11 of the United States Bankruptcy Code; and

**WHEREAS**, the Creditor is the holder of a certain Note and Mortgage, dated September 21, 2010, (together with related loan documents, the “Loan Documents”) with respect to real property located at 3878 Darlene Drive, Louisville, KY 40216 (the “Property”); and

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor’s federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554). The Debtors’ executive headquarters are located at 6300 South Syracuse Way, Suite 300, Centennial, CO 80111.

**WHEREAS**, the borrower under the Loan Documents defaulted on payments and a foreclosure action was commenced by the Creditor; and

**WHEREAS**, the Debtor holds a judgment on the Property, which is subordinate to the Creditor's lien and the Debtor was named as a party to the foreclosure action.

**NOW, THEREFORE**, it is by stipulation and agreed to and, it is hereby  
**ORDERED, ADJUDGED, AND DECREED THAT**

1. The automatic stay instituted upon the filing of this bankruptcy case is modified under 11 U.S.C. § 362(d) to permit the Creditor to commence and/or complete the foreclosure and its remedies with respect to its lien, on and in the Property.

2. The Parties agree that this Stipulated Order may be submitted to the Court to be "So Ordered."

3. This Stipulated Order may not be modified other than by a signed writing executed by the Parties hereto or by further order of the Court.

4. This Stipulated Order may be executed in multiple counterparts, each of which shall be deemed an original but all of which when taken together shall constitute one and the same instrument.

5. Pursuant to Bankruptcy Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure, the 14-day stay with respect to this Stipulated Order is hereby waived.

6. This Court shall retain jurisdiction with respect to any and all matters arising from the interpretation of this Stipulated Order.

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7. Upon the sale of the Property, the Creditor, or its agents, successors, or assigns shall provide a report of any surplus to the Debtor.

CONSENTED TO AND AGREED TO BY:

/s/Michael A. Samuels  
Michael A. Samuels  
Robertson Anschutz & Schneid, P.L.  
Attorney to Reverse Mortgage Solutions, Inc.  
as servicing agent for Bank of America, N.A.

Dated: February 22, 2018

/s/ Mitchell L. Williamson  
Mitchell L. Williamson  
Barron & Newburger, P.C.  
Counsel for Reorganized Debtor CACH, LLC

Dated: February 22, 2018

**IT IS SO ORDERED.**

Dated: February 28, 2018  
New York, New York

/s/ James L. Garrity, Jr.  
Honorable James L. Garrity, Jr.,  
United States Bankruptcy Judge